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Attorney for Plaintiff
Steve Gim

**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF NEW JERSEY**

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|---|---|
| Steve Gim | (Electronically Filed) |
| Plaintiff, | Civil Action No |
| v. | Judge |
| Bongseob Moon | |
| Defendants. | **COMPLAINT WITH JURY DEMANDS** |

Plaintiff, for his cause of action against Defendants, alleges that:

**PARTIES**

1. Plaintiff, Steve Gim, is a resident of the State of New Jersey having address at 1414 14th Street, Borough of Fort Lee, State of New Jersey

2. At all times material, Bongseob Moon was and continues to be a resident of the State of Connecticut having address at 95 High Street, Suite 1, Milford, Connecticut.

**JURISDICTION**

3. Plaintiff brings his complaint under federal diversity jurisdiction, 28 U.S.C. 1332, as the parties are completely diverse in citizenship and the amount in controversy exceeds $75,000.

**FACTS**

4. Approximately in March of 2011, Plaintiff Steve Gim ("Plaintiff Gim") and Defendant Bongseop Moon (" Defendant Moon") entered into an agreement ("Agreement") that Moon shall represent Plaintiff as an Attorney to defend him on a civil litigation filed in Hartford Connecticut on or around February 28, 2011 of which citation and docket number are CT HANGAR ASSOCIATION, INC. v. PINE TREE HANGARS, LLC , HHD-CV-11-6019330-S .

5. The civil action arose from disputes of construction of hangars between the Plaintiff CT Hangar Association, Inc. and defendant Pine Tree Hangars, LLC which is owned by Plaintiff Gim in its entirety.

6. The Agreement sets forth a scope of legal representation which includes Defendant Moon's filing of Answer and Counterclaim.

7. Defendant Moon Failed to file an Answer nor Counterclaim in direct contravention of the Agreement.

8. The final order of the Connecticut civil action entered on July 3, 2014, in favor of Plaintiff CT Hangar Association, Inc.

9. By virtue of the foregoing, Defendant Moon has committed legal malpractice and plaintiff is therefore entitled to judgment in the amount exceeding the jurisdictional requirement of this Court,

**RELIEF REQUESTED**

**COUNT I**

10. Plaintiff hereby incorporates all other paragraphs in this Complaint as though fully set forth herein at length.

11. As a direct and proximate result of said Defendants' activities, Plaintiff have sustained harm, including, but not limited to, lost of several hangars of which market values exceeds two millions of dollar.

WHEREFORE, Plaintiff demands judgment in their favor and against Defendants VAI, Flaherty, and Moon jointly and severally, for damages as follows:

A. Compensatory damages in an amount that will make them whole;

B. Pre- and post-judgment interest thereon;

C. Attorney's fees and expenses and costs of suit;

D. Such other relief that the Court deems appropriate under the circumstances.

*Respectfully Submitted,*

/s/ Sangwon D. Sohn

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